

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

_____	)	
GENERAL ELECTRIC COMPANY,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 08-591-TSE/JFA
	)	
ADRIANA KOECK,	)	
	)	
Defendant.	)	
_____	)	

**JOINT MOTION  
REGARDING COUNTERCLAIMS**

Comes Now Plaintiff General Electric Company and Defendant Adriana Koeck (“Parties”), by and through their Counsel, and move this Court to enter the Consent Order filed concurrently herewith. In support of this motion, the Parties state as follows:

1. Plaintiff’s Motion to Dismiss Defendant’s Counterclaims is currently pending before this Court and is scheduled for oral argument on November 7, 2008 at 10:00 a.m.
2. Plaintiff’s Motion to Seal Portions of Defendant’s Amended Counterclaim is currently pending before this Court and is scheduled for oral argument on October 31, 2008 at 10:00 a.m.
3. The parties have agreed to resolve all of Defendant’s Counterclaims through binding arbitration.
4. Therefore, the parties hereby request that the following relief be granted:
  - a) Defendants Counterclaim and Amended Counterclaim be dismissed without prejudice;

- b) Plaintiff's Motion to Dismiss Defendant's Counterclaim and corresponding Notice of Hearing is withdrawn, as is Plaintiff's Motion to Seal Portions of Defendant's Amended Counterclaim and corresponding Notice of Hearing;
- c) the hearings in this matter currently scheduled for 10:00 a.m. on October 31, 2008 at 10:00 a.m. and at 10:00 a.m. on November 7, 2008 are cancelled; and
- d) any and all such other relief as is in the interests of justice be imposed.

Respectfully submitted, this 21<sup>st</sup> day of October, 2008

/s/

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